

KRT/INF
2019R01114

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 20-
	:	
YUAN HUA CHIN,	:	18 U.S.C. § 1344
a/k/a "Larry Chin,"	:	
	:	

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

Count One
(Bank Fraud)

From on or about November 15, 2017 through on or about October 1, 2019, in Bergen County, in the District of New Jersey and elsewhere, the defendant,

YUAN HUA CHIN,
a/k/a "Larry Chin,"

knowingly executed a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain the money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of materially false and fraudulent pretenses, representations, and promises, with the intent to deceive such financial institution.

In violation of Title 18, United States Code, Section 1344.

FORFEITURE ALLEGATION

As a result of committing the conspiracy to commit bank fraud offense charged in this Information, the defendant,

YUAN HUA CHIN,
a/k/a "Larry Chin,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2), any property constituting or derived from proceeds obtained directly or indirectly as a result of the violation of Title 18, United States Code, Section 1344 alleged in this Information.

Substitute Assets Provision

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described above.


CRAIG CARPENITO
United States Attorney

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UNITED STATES OF AMERICA

v.

**YUAN HUA CHIN,
a/k/a "Larry Chin"**

INFORMATION FOR

18 U.S.C. § 1344

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